

# GHAJAR EXHIBIT 61

11/18/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.  
Highly Confidential - Attorneys' Eyes Only

Alexander Boesenberg

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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RICHARD KADREY, ET AL., )  
INDIVIDUAL AND REPRESENTATIVE )  
PLAINTIFFS, ) LEAD CASE NO.  
v. ) 3:23-cv-03417-VC  
META PLATFORMS, INC., )  
DEFENDANT. )  
\_\_\_\_\_ )

\* \* \* H I G H L Y C O N F I D E N T I A L \* \* \*  
\* \* \* A T T O R N E Y S ' E Y E S O N L Y \* \* \*

VIDEO-RECORDED DEPOSITION OF  
ALEXANDER BOESENBERG  
MONDAY, NOVEMBER 18, 2024  
SAN FRANCISCO, CALIFORNIA  
9:04 A.M. PST

REPORTED BY AUDRA E. CRAMER, CSR NO. 9901

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DIGITAL EVIDENCE GROUP  
1730 M Street, NW, Suite 812  
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1 Q. Okay. Now, [REDACTED] actually gave  
2 you a number for each book that -- a price temp  
3 for each book to license; right? That Meta  
4 wanted to license; right?

5 A. I mean, this looks -- that appears to  
6 be the case here, but, again, you know, as I've  
7 said, it's just one -- it's like -- it's a price  
8 for a volume of books, but I don't know all of  
9 the other important details.

10 Q. Right. But, you know, what was the  
11 price that [REDACTED] -- well, [REDACTED]  
12 offers -- or at least from this message, offered  
13 prices for two types of books; right?

14 A. Yes.

15 Q. All right. What are the two types?

16 A. Romance books and fiction books.

17 Q. Okay. And what was [REDACTED]  
18 opening offer or offer at this time for  
19 licensing a romance book?

20 A. Well, I think this document implies  
21 that it was \$10,000 per romance book and \$30,000  
22 per fiction book.

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1 [REDACTED] relayed to you?

2 A. I can't remember the conversation, but  
3 I believe so.

4 Q. Okay.

5 A. I mean, I -- you know, I have no reason  
6 to think this bullet is incorrect.

7 Q. Okay. Now, a deal with [REDACTED]  
8 was never consummated; right?

9 A. Correct.

10 Q. Did you even negotiate an evaluation  
11 including [REDACTED]?

12 A. I can't remember. I don't -- I don't  
13 think we made it that far.

14 Q. Okay. Do you recall if [REDACTED]  
15 was the one to say no to the deal or if Meta was  
16 the one to say no to the deal?

17 A. I think we just -- you know, I think  
18 they had -- well, I don't completely recall it.  
19 But when I looked at the other  
20 document, there was a pricing proposal. It  
21 seemed like, from the document, that we thought  
22 the pricing proposal was too high. I don't

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1 remember ever countering with a new pricing  
2 proposal, so I imagine we just kind of went our  
3 separate ways after that.

4 Q. Okay.

5 THE WITNESS: I'm going to need some --  
6 a bite to eat soon.

7 MR. YOUNG: Yeah, let me -- well, let's  
8 just go check on lunch real quickly.

9 If we can just go off the record  
10 briefly and then...

11 THE VIDEOGRAPHER: Okay. We are off  
12 the record at 11:56.

13 (Recess taken.)

14 THE VIDEOGRAPHER: We are now on the  
15 record at 12:09.

16 MR. YOUNG: So during the break we  
17 marked as Plaintiffs' 136 a document bearing  
18 Meta\_Kadrey\_00152934.

19 (Whereupon, Exhibit 136 was  
20 marked for identification.)

21 BY MR. YOUNG:

22 Q. Why don't you take a couple of moments

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1 STATE OF CALIFORNIA )

2 COUNTY OF LOS ANGELES ) SS.

3 I, AUDRA E. CRAMER, CSR No. 9901, in and for the  
4 State of California, do hereby certify:

5 That, prior to being examined, the witness named  
6 in the foregoing deposition was by me duly sworn to  
7 testify the truth, the whole truth and nothing but the  
8 truth;

9 That said deposition was taken down by me in  
10 shorthand at the time and place therein named, and  
11 thereafter reduced to typewriting under my direction,  
12 and the same is a true, correct and complete transcript  
13 of said proceedings;

14 I further certify that I am not interested in the  
15 event of the action.

16 Witness my hand this 21 day of November,  
17 2024.

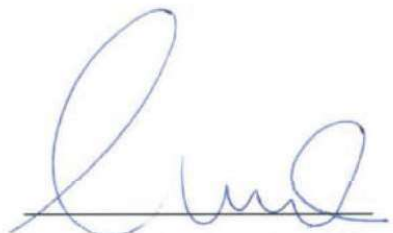
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Certified Shorthand

Reporter for the

State of California